

### REMARKS

Claims 1-45 are pending. Claims 1-4, 6-11, 13, 14, 18-21, 23-26 and 29 are rejected under 35 U.S.C. 102(b) as being anticipated by U.S. Patent No. 5,943,063 ("Dowling"). Claims 15, 17, 30 and 32 are rejected under 35 U.S.C. 103(a) as being unpatentable over Dowling further in view of U.S. Patent No. 4,675,830 ("Hawkins"). Claims 5, 12, 22 and 27 are objected to as being dependent upon a rejected base claim, but would be allowable if rewritten in independent form including all of the limitations of the base claim and any intervening claims. Claims 1, 5, 6, 10, 11, 18, 22, 23, 25 and 26 are amended. Claims 33-45 are new. The applicant respectfully traverses the rejections, and requests reconsideration in view of the above amendments and the following remarks.

#### **I. The 102(b) Rejections**

The Examiner rejected claims 1-4, 6-11, 13, 14, 18-21, 23-26 and 29 under 35 U.S.C. 102(b) as being anticipated by Dowling.

##### Claims 1-4 and 18-21

Claim 1 recites a system for rendering a character for display in grayscale on a grayscale output device. The system includes a stem aligner means for processing a stem of the character, before rendering the character for output. The stem aligner means includes means for performing a black-edge hinted stem placement policy, where the black-edge policy considers stem width when determining stem placement.

The Examiner asserts that the above limitation is disclosed by Dowling, and refers specifically to Dowling at column 8, lines 27-52. However, the "soft policy" described by Dowling does not consider stem width when determining stem placement. The soft policy considers whether or not the stem is a ghost stem. If the stem is not a ghost stem, the soft policy considers the proximity of the stem to the grid. Dowling does not disclose any reason for taking the stem width into consideration, since the stem placement (if not a ghost stem), is based solely on proximity to the grid. Accordingly, Dowling does not anticipate claim 1. Claims 2-4 depend from claim 1, and are therefore allowable for at least the same reasons.

Claim 18 is a computer program product claim that recites limitations parallel to the limitations of claim 1, which recites a system claim. Accordingly, for at least the reasons stated above in reference to claim 1, claim 18 and, claims 19-21 which depend from claim 18, are in condition for allowance.

Claims 6-9 and 23-24

Claim 6 recites a system for rendering a character for display in grayscale on a grayscale output device. The system includes stem aligner means for processing a stem of the character before rendering the character for output on the output device. The stem aligner means include means for performing an unbiased-stems hinted stem placement policy. The unbiased-stems policy considers stem spread when determining stem placement.

The Examiner asserts that the above limitation is disclosed by Dowling, and refers particularly to Dowling at column 8, lines 27-52. The applicant respectfully submits the Examiner has misconstrued Dowling. At col. 8, lines 27-52, Dowling describes a stem placement policy that considers the *proximity of a stem to grid*, and aligns a stem edge to the grid cell *based on the proximity* (lines 37-42). Dowling discloses aligning a stem edge to a grid cell, does not disclose taking the *stem spread* (i.e., how many coarse grid cells are marked or painted by the stem, see Specification at p. 5, lines 8-9) into consideration when determining stem placement, as required by the claim. The stem spread does not matter to Dowling, because Dowling determines stem placement based only on the proximity of a stem edge to a grid cell. The number of coarse grid cells marked by the stem are not relevant to this determination. Accordingly, Dowling fails to anticipate the limitations of claim 6, which is in condition for allowance.

Claims 7-9 depend from claim 6, and are therefore allowable for at least the same reasons as claim 6.

Claim 23 is a computer program product claim that recites limitations parallel to the limitations of claim 6, which recites a system claim. Accordingly, for at least the reasons stated above in reference to claim 6, claim 23 and claim 24, which depends from claim 23, are in condition for allowance.

Claims 10-17 and 25-32

Claim 10 recites a method for processing a stem of a character outline. The method includes the step of selecting a hinted stem placement policy from a set of policies including at least either a black-edge policy or an unbiased-stems policy. The black-edge policy considers stem width when determining stem placement, and the unbiased-stems policy considers stem spread when determining stem placement. The Examiner asserts that the above limitation is disclosed by Dowling, and refers particularly to Dowling at column 8, lines 7-14 and 27-52. For the reasons stated above in reference to claims 1 and 6, the applicant submits that Dowling does not disclose a stem placement policy that considers either stem width or stem spread when determining stem placement, as required by the claim. Accordingly, Dowling does not anticipate the limitations of claim 10, which is in condition for allowance.

Claims 11-17 depend from claim 10, and are therefore allowable for at least the same reasons as claim 10.

Claim 25 is a computer program product claim that recites limitations parallel to the limitations of claim 10, which recites a method claim. Accordingly, for at least the reasons stated above in reference to claim 10, claim 25 and claims 26-32, which depend from claim 25, are in condition for allowance.

**II. The 103(a) Rejections**

The Examiner rejected claims 15, 17, 30 and 32 as being unpatentable over Dowling as applied to claims 10 and 25, further in view of Hawkins. For at least the reasons stated above, Dowling does not disclose the limitations recited in independent claim 10, from which claims 15 and 17 depend, and in independent claim 25, from which claims 30 and 32 depend. Hawkins also fails to disclose the limitations recited in the independent claims 10 and 25. Accordingly, the combination of Dowling and Hawkins fails to disclose or suggest all of the limitations of the base claims, and therefore claims 15, 17, 30 and 32 are in condition for allowance.

### **III. Allowable Subject Matter**

The Examiner objected to claims 5, 12, 22 and 27 as being dependent upon a rejected base claim, but stated they would be allowable if rewritten in independent form, including all of the limitations of the base claim and any intervening claims.

Claims 5, 12, 22 and 27 depend from claims 1, 10, 18 and 25 respectively. The base claims have been amended and are in condition for allowance. Accordingly, claims 5, 12, 22 and 27 are also allowable for at least the same reasons.

### **IV. New Claims**

Claims 33-45 are new. The new claims are supported by the specification, and no new matter has been added.

Claim 33 depends from claim 6, and is allowable for at least the same reasons as stated above in reference to claim 6. In particular, claim 33 recites means for performing an unbiased-stems policy, which means are not disclosed by Dowling.

Claim 34 depends from 23, and is allowable for at least the same reasons as stated above in reference to claim 23. In particular, claim 34 recites a computer program product including instructions operable to perform an unbiased-stems hinted stem placement policy, which is not disclosed by Dowling.

Claim 35 recites a method for rendering a character for display in grayscale on a grayscale output device. The method includes limitations parallel to limitations recited in claim 6, which recites a system. Accordingly, claim 35, and claims 36-38 which depend therefrom, are allowable for at least the same reasons as claim 6.

Claim 39 recites a method for rendering a character for display in grayscale on a grayscale output device. The method includes limitations parallel to limitations recited in claim 1, which recites a system. As stated above, claim 1 is in condition for allowance. Accordingly, claim 38, and claims 39-43 which depend therefrom, are allowable for at least the same reasons as claim 1.

Claim 44 depends from claim 13, which depends from claim 10, and is allowable for at least the same reasons as stated above in reference to claim 10. Claim 45 depends from claim

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28, which depends from claim 25, and is allowable for at least the same reasons as stated above in reference to claim 25.